

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

TOWN OF FRAMINGHAM REQUEST FOR)	
DETERMINATION OF RATES APPLICABLE TO)	D.T.E. 02-46
TRANSPORTATION AND TREATMENT OF SEWAGE)	
PURSUANT TO INTERMUNICIPAL AGREEMENT)	
)	

**TOWN OF FRAMINGHAM'S RESPONSE TO
THE DEPARTMENT'S FIRST RECORD REQUEST**

The Town of Framingham ("Framingham") responds to the DTE's first record request as follows.

Record Request No. 1 (July 18, 2003, Tra. at 278-79)

Please provide a specific citation to that portion of the February, 2001 MWRA odor and corrosion control study referenced in Framingham's response to ASH-2-10 as supporting SEA's finding that Ashland's discharges contained 80% of the sulfate loading for the combined Framingham/Ashland flow.

Response to Record Request No. 1

SEA's finding in its May, 2001 report was based on data contained in a Technical Memorandum attached at Appendix C to the MWRA FES Odor and Corrosion Control Alternatives Evaluation and Recommended Action Plan (February, 2001), at pages 1 through 9. At the DTE's request, Framingham provided a complete copy of the MWRA's February, 2001 report to the DTE, and to counsel for Ashland, at the beginning of the evidentiary hearing in this matter. For convenience, copies of the relevant pages from the TM are attached hereto.

The 80% figure was derived as follows. Table 1 to the TM reflects that the total industrial sulfate load at the head of the FES (Sampling Location ("SL") 08) was 6,556 lbs/day (6,650 - 94). Table 1 also reflects that two industries in Ashland (Kidde-Fenwal, Inc. and Nyacol Products, Inc.) contributed 6,385 lbs/day to the total industrial load.

Using the bar chart provided in Figure 10, SEA determined that the total non-industrial sulfate load at the head of the FES was 2,070 lbs/day. SEA made this determination by dividing the total industrial load at the head of the FES (6,556 lbs/day) by 76% (the percentage attributable to industrial loadings on the bar chart), resulting in a total sulfate load of 8,626 lbs/day, then multiplying that total load by 24% (the percentage attributable to non-industrial loadings on the bar chart), resulting in a total non-industrial load of 2,070 lbs/day. To determine the percentage of that non-industrial load attributable to Ashland, SEA multiplied 2,070 lbs/day by Ashland's flow percentage of 9% (an approximate allocation based on flow data available at the time SEA prepared its report), resulting in a figure of 186 lbs/day.

SEA then added Ashland's industrial sulfate load (6,385 lbs/day) and non-industrial sulfate load (186 lbs/day) and divided that total (6,571 lbs/day) by the total sulfate load at the head of the FES (8,626 lbs/day), which resulted in a

percentage allocation to Ashland of 76.1%. SEA rounded this figure to the 80% figure referenced in SEA's report and in Framingham's response to ASH 2-10.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

Respectfully submitted,
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